

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MASTR ADJUSTABLE RATE MORTGAGES
TRUST 2006-OA2, MASTR ADJUSTABLE
RATE MORTGAGES TRUST 2007-1, AND
MASTR ADJUSTABLE RATE MORTGAGES
TRUST 2007-3,

Plaintiffs,

12 Civ. 7322 (PKC)

-against-

UBS REAL ESTATE SECURITIES INC.,

Defendant.

**DECLARATION OF THOMAS A. BRIDGES IN SUPPORT OF
THE TRUSTS' MOTION TO STRIKE TESTIMONY CONCERNING UBS'S LOAN
SURVEILLANCE PROGRAM**

I, Thomas A. Bridges, submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am an associate of the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Plaintiffs in the above-captioned matter, and am a member in good standing of the bar of New York.

2. I respectfully submit this Declaration in support of the Trusts' Motion to Strike Testimony Concerning UBS's Loan Surveillance Program.

3. Attached as Exhibit 1 is a true and correct (highlighted) copy of an excerpt from the deposition of John E. Lantz, in which he states that the decision to close the Loan Surveillance Program was made by counsel, and counsel for UBS asserts privilege over the reasoning behind that decision, dated February 5, 2014.

4. Attached as Exhibit 2 is a true and correct (highlighted) copy of an excerpt from the 30(b)(6) deposition of John E. Lantz, in which Judge Francis warns the parties not to use privilege as a sword and a shield, dated February 7, 2014.

5. Attached as Exhibit 3 is a true and correct (struck-through) copy of an excerpt from the trial transcript in the above-captioned matter, in which Lantz testifies as to the reasons UBS closed its Loan Surveillance Program.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 6, 2016, in New York, New York.

By: /s/ Thomas A. Bridges
Thomas A. Bridges